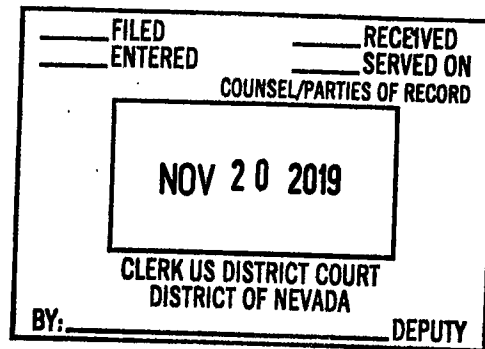


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8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 vs.

13 LATONIA SMITH,

14 Defendant.

CRIMINAL INDICTMENT

Case No.: 2:19-cr- 304

VIOLATIONS:

18 U.S.C. § 876(c) – Mailing Threatening
Communications (Counts One through
Five)

15 THE GRAND JURY CHARGES THAT:
16

17 COUNT ONE

Mailing Threatening Communications
(Title 18, United States Code, Section 876(c))

19 On or about August 11, 2018, in the State and Federal District of Nevada and
20 elsewhere,

21 LATONIA SMITH,

22 defendant herein, knowingly caused to be delivered by the United States Postal Service,
23 according to the directions thereon, a communication containing a threat to injure the
24 person of the addressee and another, to wit: a letter directed to S.R., stating, among other

1 things, "yo[u] do not deserve the air you breath . . . all will die . . . starting with the head . .
2 . REAL THREAT . . . FIX ITDeadline Monday . . . Pass Along."

3 All in violation of Title 18, United States Code, Section 876(c).

4 **COUNT TWO**

5 Mailing Threatening Communications
(Title 18, United States Code, Section 876(c))

6 On or about April 25, 2019, in the State and Federal District of Nevada and
7 elsewhere,

8 **LATONIA SMITH,**

9 defendant herein, knowingly caused to be delivered by the United States Postal Service
10 according to the directions thereon, a communication to injure the person of the addressee
11 and another, to wit: letters addressed to W.B. and S.B., stating, among other things,
12 "[c]ongratulations you have just been added to the hit list . . . congratulations on your
13 wedding [S.B.] hopefully you'll be around for many years to enjoy it . . . revenge is the
14 sweetest joy and every single one of you will meet it face to face no one will be safe . . . will
15 never see it coming it will just be lights out"

16 All in violation of Title 18, United States Code, Section 876(c).

17 **COUNT THREE**

18 Mailing Threatening Communications
(Title 18, United States Code, Section 876(c))

19 On or about September 30, 2019, in the State and Federal District of Nevada and
20 elsewhere,

21 **LATONIA SMITH,**

22 defendant herein, knowingly caused to be delivered by the United States Postal Service
23 according to the directions thereon, a communication to injure the person of the addressee
24 and another, to wit: letters addressed to S.P., stating, among other things, "[y]our throat

1 will be slit you will be recorded as the blood spills from your neck and just as you gasp to
2 take your final undeserving breath three bullets will be placed right through your skull . . .
3 [w]hen you least expect it you will beg for your lives and your childrens lives. Everyone
4 around you will die a painful death”

5 All in violation of Title 18, United States Code, Section 876(c).

6 **COUNT FOUR**

7 Mailing Threatening Communications
(Title 18, United States Code, Section 876(c))

8 On or about September 30, 2019, in the State and Federal District of Nevada and
9 elsewhere,

10 **LATONIA SMITH,**

11 defendant herein, knowingly caused to be delivered by the United States Postal Service
12 according to the directions thereon, a communication to injure the person of the addressee
13 and another, to wit: a letter addressed to T.G., stating, among other things, “[y]our throat
14 will be slit you will be recorded as the blood spills from your neck and just as you gasp to
15 take your final undeserving breath three bullets will be placed right through your skull . . .
16 [w]hen you least expect it you will beg for your lives and your childrens lives. Everyone
17 around you will die a painful death”

18 All in violation of Title 18, United States Code, Section 876(c).

19 **COUNT FIVE**

20 Mailing Threatening Communications
(Title 18, United States Code, Section 876(c))

21 On or about October 1, 2019, in the State and Federal District of Nevada and
22 elsewhere,

23 **LATONIA SMITH,**
24

1 defendant herein, knowingly caused to be delivered by the United States Postal Service
2 according to the directions thereon, a communication to injure the person of the addressee
3 and another, to wit: a letter received by J.W., stating, among other things, "[y]our throat
4 will be slit you will be recorded as the blood spills from your neck and just as you gasp to
5 take your final undeserving breath three bullets will be placed right through your skull . . .
6 [w]hen you least expect it you will beg for your lives and your childrens lives. Everyone
7 around you will die a painful death"

8 All in violation of Title 18, United States Code, Section 876(c).

9 DATED this 20th day of November 2019.

10 A TRUE BILL:

11
12 /S/
13 FOREPERSON OF THE GRAND JURY
14

15 NICHOLAS A. TRUTANICH
16 United States Attorney

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18 STEVEN W. MYHRE
Assistant United States Attorney
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